



CTI and Associates, Inc.
12482 Emerson Drive; Brighton, MI 48116
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LETTER OF TRANSMITTAL

Date: March 17, 2004

Project No.: Proj # 58043018

To: Jack Schinderle
MDEQ - WHMD
Constitution Hall
525 West Allegan
Lansing, MI 48913

Re: Arkona Road Landfill Petition

Included is the following information:

- ☒ Original Document
- ☒ Copy of Document
- ☐ Plans
- ☐ Other

This is transmitted:

- ☐ For your approval
- ☒ For your use
- ☐ As requested
- ☒ For review

COPIES	DATE	DESCRIPTION
2	3/17/05	Waste De-Listing Petition

COMMENTS: _____

COPIES TO: Steve Haton

SIGNED

Terri Zick
Industrial Services Manager



CTI and Associates, Inc.

12482 Emerson Drive Brighton, MI 48116 248.486.5100 248.486.5050 fax

March 18, 2005

Mr. Jack Schinderle
Michigan Department of Environmental Quality
Waste and Hazardous Materials Division
Constitution Hall
525 West Allegan Street
Lansing, MI 48913

Re: Arkona Road Landfill;
Waste De-Listing Petition

Dear Mr. Schinderle,

In accordance with the provisions of 40 CFR Part 260.22, and previous discussions with Michigan Department of Environmental Quality staff, CTI and Associates, Inc. (CTI) has prepared the attached petition for re-designation of waste generated at the Arkona Road Landfill.

Leachate generated at the Arkona Road facility is currently managed as a F006 listed waste. On behalf of the Environmental Quality Company (EQ), CTI requests that the waste be re-classified as a non-hazardous liquid industrial waste on the basis that the waste poses limited risk and is unlikely to vary significantly in character over time.

The waste does not meet the definition of a characteristic waste as defined at 40 CFR 261.21-24. Additionally, the untreated waste has been demonstrated to meet the Universal Treatment Standards (UTS) at the point of generation for each constituent for which the F006 listing was established (cadmium, chromium, nickel, cyanide).

Please do not hesitate to contact either myself or Steve Haton (EQ) with questions regarding the attached petition.

Sincerely,

Terri Zick, CHMM
Industrial Services Manager

Cc: Steve Haton, EQ
Erin Torrone, CTI

Waste & Hazardous
Materials Division

MAR 21 2005

**Petition to De-List Regulated Waste
F006 Landfill Leachate**

**The Environmental Quality Company
Arkona Road Landfill, Milan, MI**



Prepared for

The Environmental Quality Company
Mr. Steve Haton
49350 North I-94 Service Drive
Belleville, MI 48111

March, 2005

Prepared by

CTI and Associates, Inc.
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Brighton, Michigan 48116
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Project No. 58043012

Waste & Hazardous
Materials Division

MAR 21 2005